

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIM. NO. 1:19-CR-227

v. :

: (Judge Mr. Conner)

TRAVIS PARKER :

Prose Defendant :

**FILED**  
HARRISBURG, PA

AUG 21 2020

PER

*MW*  
DEPUTY CLERK

MOTION FOR THE COURT TO RECONSIDER ITS DECISION  
DENYING DEFENDANTS MOTION TO BE RELEASED ON  
BAIL TEMPORARILY TO BE ABLE TO PREPARE FOR TRIAL  
IN LIGHT OF THIS DECISION BEING BASED ON  
MISINFORMATION UNBEKNOWNST TO THE COURT

ARGUMENT / INTRODUCTION

On August 13, 2020, Mr. Brian Clark of DCP testified that inmates were able to receive private visits from lawyers and the like. On August 14, 2020, my private investigator Mr. Chuck Katerman called DCP via telephone to schedule a private visit, Mr. Katerman was informed by prison officials that he could not enter the prison until Covid 19 lockdown restrictions were lifted, contrary to sworn testimony provided by Mr. Brian Clark. Likewise Lieutenant Aderman of DCP informed me that my stand by counsel Mr. Ari Weisman-whom will explain court protocol and procedure simultaneously while im instructing



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and garnering information from my Private Investigator to bilaterally form a strategy that corresponds - could not enter the prison until Covid-19 lockdown restrictions were lifted. In addition, moreover my strategy is comprised utilizing the tablet and phone to gather potential beneficial information via phone calls. Also, the fact that I only employed the law library application on the tablet for 2 hours since May 1, 2020 - when my pre-trial suppression hearing was denied - is a testament to the forced suspension of my preparation for trial. I've been deprived of my Private Investigator's services for 3 and one half months. Additionally 2 out of 3 counts that I am charged with are 2 years old. Coincidentally potential witnesses memories of events related to said charges may wane and physical material evidence is subject to loss.

### CONCLUSION

With all due respect, The Court's careful thought and decision was based on perjurious testimony. Furthermore Time is of the essence in reference to the preservation of material evidence. Therefore, I humbly ask that the court resolve this matter without an hearing being held, temporarily releasing me on bail for the foregoing ~~the~~ reasons and considering the court's conclusion on August 13, that any public safety concern regarding the defendant could be ameliorated on account of his third party custodian, an imposed curfew and electric monitoring further the government does not contest the fact that the



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defendant is not a flight risk.

Sincerely  
T. Parker

8/16/20

Mr. Travis Thurston Parker  
DCP  
501 Mall Rd.  
Harrisburg, PA 17111

Name Mr. Travis Thurston Parker

D.C.P. # 60910

**Dauphin County Prison**

501 Mall Road

Harrisburg, PA 17111

HARRISBURG PA 171

18 AUG 2020 PM 30

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HARRISBURG, PA

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U.S. Courthouse  
Mid. Dist. of PA  
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Harrisburg, PA 17101

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